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Attorney(s) for the County of Marin.

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Barbara Kob,

Plaintiff,

v.

County of Marin; and DOES 1 through 50,

Defendant.

Case No.: USDC 07 2211 JL

STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING DISPOSITIVE MOTION  
DATES

1. WHEREAS, the motion for summary judgment or in the alternative for partial summary judgment has been taken under submission by the Court on November 18, 2009;

2. WHEREAS, the parties agree that at the hearing for the motion for summary judgment or in the alternative for partial summary judgment of November 18, 2009, the Court indicated that, at least initially, the Court was inclined to grant at least some portion of the motion for summary judgment;

3. WHEREAS, the parties agree that the pretrial submission due on November 25, 2009 are linked very closely to the actual causes of action that will be heard at trial, such as submissions related to jury instructions, motions in limine as to specific evidence that relate to specific causes of action, damages calculations, and documents that will be used as evidence;

4. WHEREAS, the parties agree that in order to comply with the pretrial submission deadline of November 25, 2009, there is a potential for a significant amount of attorney's fees and costs expended by both sides over the next week that may prove to be unnecessary;

STIPULATION AND ORDER

5. WHEREAS, the parties are scheduled to conduct deposition of expert witnesses shortly, and the fees for their time are significant;

6. WHEREAS, the parties agree that an extension of time to submit the pretrial statement and other submissions will both limit potentially wasted resources of the parties and allow the parties to submit more focused papers and filings once the summary judgment motion ruling is fully known to the parties;

IT IS HEREBY STIPULATED by and between the parties that:

1. The parties pretrial submissions should be due six court days after the Court issues an order following Defendant's motion for summary judgment or in the alternative for partial summary judgment;

2. Oppositions to motions in limine should be due December 15, 2009;

3. Expert discovery shall be concluded on or before December 11, 2009;

4. Pretrial Conference shall be held December 23 at 11:00 a.m.

Dated: November 19, 2009

KAHN, BROWN & POORE

BY: \_\_\_\_\_/s/\_\_\_\_\_  
DAVID POORE  
Attorney for Plaintiff

Dated: November 18, 2009

PATRICK K. FAULKNER  
MARIN COUNTY COUNSEL


BY: \_\_\_\_\_/s/\_\_\_\_\_  
STEPHEN RAAB  
Attorneys for Defendant County of Marin

PROPOSED ORDER

THE COURT HEREBY ORDERS AS FOLLOWS:

The parties request to have the pretrial submissions due six court days after the Court issues an order following Defendant's motion for summary judgment or in the alternative for partial summary judgment is hereby GRANTED. The parties request to have oppositions to motions in limine due December 15, 2009 is hereby GRANTED. The parties request to have expert discovery concluded on or before December 11, 2009 is hereby GRANTED. The parties request to hold the Pretrial Conference on December 23 at 11:00 a.m. is hereby GRANTED.

DATED: 11/20/09

  
James Larson  
Magistrate Judge of the District Court